

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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DOCKET NO. R97-1

**INTERROGATORY OF UNITED PARCEL SERVICE
TO DIRECT MARKETING ASSOCIATION, INC. WITNESS BUC
(UPS/DMA-T1-1)**

(January 28, 1998)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to Direct Marketing Association, Inc. witness Buc (UPS/DMA-T1-1).

Respectfully submitted,



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**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO DIRECT MARKETING ASSOCIATION, INC. WITNESS BUC**

UPS/DMA-T1-1. Please refer to page 20 of your testimony.

(a) Please confirm that your analysis of distribution key "thinness" includes distribution keys which would be "thin" under the LIOCATT system (e.g., Nonmods Outgoing, Incoming, Transit, and Other pools). If not confirmed, please explain.

(b) Please confirm that LIOCATT uses distribution keys with fewer than five tallies in the distributing set. If not confirmed, please explain.

(c) Please confirm that your distribution analysis would result in distribution keys with fewer than five tallies. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: January 28, 1998
Philadelphia, PA